

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<i>In re Terrorist Attacks on September 11, 2001</i>	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., Civil Action No. 1:16-cv-07853 (S.D.N.Y.);
Aguilar et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09663 (S.D.N.Y.);
Addesso et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09937 (S.D.N.Y.);
Aiken et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:17-cv-00450 (S.D.N.Y.);
Hodges et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:17-cv-00117 (S.D.N.Y.);
The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., Civil Action No. 1:17-cv-02651 (S.D.N.Y.);
Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03908 (S.D.N.Y.);
Abarca, et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03887 (S.D.N.Y.);
Abedhajajreh, et al. v. Kingdom of Saudi Arabia, et al., Civil Action 17-cv-06123 (S.D.N.Y.).

MOTION TO EXTEND PRO HAC VICE ADMISSION

PLEASE TAKE NOTICE that The National Commercial Bank (“NCB”) hereby moves this Court for an Order: (i) extending the *pro hac vice* admission of Alan T. Dickey to the above-captioned cases consolidated into 03-md-1570 (GBD)(SN) (the “MDL”) before this Court; and also (ii) directing the Clerk of the Court to enter Mr. Dickey’s appearance in the above-captioned cases.

Alan T. Dickey was admitted *pro hac vice* as counsel for NCB on September 7, 2010 in all cases that were consolidated in this MDL at that time. *See* Dkt. No. 2282.

As the Court is aware, several additional cases have been consolidated into this MDL in recent months, and more could be expected. Moving for *pro hac vice* admission in each related case would be cumbersome and would require repeated applications to the Court. NCB moves the Court to extend counsel’s *pro hac vice* admission in the United States District Court for the Southern District of New York to the cases consolidated into the MDL, now or in the future, to permit counsel to appear in the above-captioned cases, and to file notices of appearance in other consolidated MDL cases as

appropriate.

NCB further respectfully requests that the Court enter Mr. Dickey's appearance as one of its counsel in the above-captioned cases.

This Court issued Orders granting similar relief to counsel for the Kingdom of Saudi Arabia on March 28, 2017 (Dkt. No. 3485) and on July 28, 2017 (Dkt. No. 3663).

In moving for an Order extending Mr. Dickey's *pro hac vice* admission, and in requesting the entering of his appearance as one of NCB's counsel, NCB respectfully reserves all of its defenses and objections, including objections to this Court's personal jurisdiction. *See Zherka v. Ryan*, 52 F. Supp. 3d 571, 577 (S.D.N.Y. Sept. 30, 2014) ("Merely making a general appearance before the court will not constitute a waiver of the defense so long as the party makes a timely challenge to the court's jurisdiction." (citing *Grammenos v. Lemos*, 457 F.2d 1067, 1070 (2d Cir. 1972)).

Dated: August 15, 2017
Washington, D.C.

Respectfully submitted,

/s/ Mitchell R. Berger
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Motion to Extend *Pro Hac Vice* Admission was electronically filed this 15th day of August 2017. Notice of this filing will be sent to all parties in 03-md-1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system, including the following constituent cases in which The National Commercial Bank is named as a Defendant. Parties may access this filing through the Court's ECF system.

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., Civil Action No. 1:16-cv-07853 (S.D.N.Y.);

Aguilar et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09663 (S.D.N.Y.);

Addesso et al. v. Kingdom of Saudi Arabia et al., Civil Action No. 1:16-cv-09937 (S.D.N.Y.);

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Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03908 (S.D.N.Y.);

Abarca, et al. v. Kingdom of Saudi Arabia, et al., Civil Action No. 17-cv-03887 (S.D.N.Y.);

Abedhajahreh, et al. v. Kingdom of Saudi Arabia, et al., Civil Action 17-cv-06123 (S.D.N.Y.).

/s/ Mitchell R. Berger

Mitchell R. Berger